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ATTORNEYS FOR PLAINTIFF
PICK-N-PULL AUTO DISMANTLERS

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

PICK-N-PULL AUTO DISMANTLERS, a
California general partnership,

Plaintiff,

v.

ALCO IRON & METAL CO., a California
corporation; CESAR ZAMORA, an individual;
RICARDO ZAMORA, an individual; EMILIO
ZAMORA an individual; and DOES 1-25,

Defendants.

CASE NO. 3:14-cv-03275 VC

STIPULATION AND ~~PROPOSED~~ ORDER
TO ENLARGE TIME TO RESPOND TO
MOTIONS TO DISMISS

WHEREAS, the parties have agreed to participate in a mediation on October 7, 2014;

WHEREAS, Defendants have filed motions to dismiss pursuant to Fed.R.Civ.P. 12(b)(6),
with the hearing set for November 20, 2014;

WHEREAS, pursuant to Civ. L.R. 7-3(a), any response to the motions must be filed no later
than October 6, 2014;

WHEREAS, pursuant to Civ. L.R. 7-3(c), any replies must be filed no later than October 14,
2014;

WHEREAS, the parties are hopeful that the case can be settled in mediation and would like
to avoid incurring unnecessary attorneys' fees related to the motions to dismiss;

WHEREAS, the parties have previously stipulated to extend time to September 22, 2014 for
Defendants to file responsive pleadings, and the parties have previously stipulated to an enlargement

of time as to the dates set forth in the Court's Order Setting Initial Case Management Conference and ADR Deadlines, which the Court entered as an order on September 24, 2014; and

WHEREAS, the proposed enlargement of time will not affect the hearing date for the motions to dismiss, or any other aspect of the schedule for this case;

IT IS HEREBY STIPULATED and agreed to, by and among the undersigned, on behalf of their respective clients, to jointly request that the Court enlarge time and set a new briefing schedule for the motions to dismiss as follows:

1. The last date for filing any response brief be reset to October 27, 2014;
2. The last date for filing any reply brief be reset to November 6, 2014.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED: SEPTEMBER 25, 2014

BERLINER COHEN

BY: /S/ KATHLEEN F. SHERMAN

JONATHAN D. WOLF

KATHLEEN F. SHERMAN

ATTORNEYS FOR PLAINTIFF

PICK-N-PULL AUTO DISMANTLERS

Attestation of Consent to File:

BY: /S/ CHARMAINE G. YU

CHARMAINE G. YU

ATTORNEYS FOR ALCO IRON & METAL CO.

I, Kathleen F. Sherman, declare that Charmaine G. Yu gave me her permission to affix her electronic signature to this document.

/s/ Kathleen F. Sherman

THE LAW OFFICES OF ERIK BABCOCK

BY: /S/ ERIK BABCOCK

ERIK BABCOCK

ATTORNEYS FOR EMILIO ZAMORA

Attestation of Consent to File:

I, Kathleen F. Sherman, declare that Erik Babcock gave me his permission to affix his electronic signature to this document.

/s/ Kathleen F. Sherman

THE LAW OFFICES OF PAUL M.
WELLENKAMP

Attestation of Consent to File:

BY: /s/ PAUL M. WELLENKAMP

PAUL M. WELLENKAMP
ATTORNEYS FOR CESAR ZAMORA

I, Kathleen F. Sherman, declare that Paul M. Wellenkamp gave me his permission to affix his electronic signature to this document.

/s/ Kathleen F. Sherman

BONJOUR, THORMAN, BARAY &
BILLINGSLEY

Attestation of Consent to File:

BY: /s/ MICHAEL THORMAN

MICHAEL THORMAN
ATTORNEYS FOR RICARDO ZAMORA

I, Kathleen F. Sherman, declare that Michael Thorman gave me his permission to affix his electronic signature to this document.

/s/ Kathleen F. Sherman

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: September 26, 2014

